

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TESSA KNOX

Plaintiff,

v.

JOHN VARVATOS ENTERPRISES, INC.

Defendant.

Civil Action No. 1:17-cv-00772
(GWG)

**DECLARATION OF
JOHN VARVATOS**

Pursuant to 28 U.S.C. § 1746, I, John Varvatos, hereby declares as follows:

1. This supplements the declaration that I executed on April 24, 2019. I am supplementing that declaration because I now have looked at the Playboy tee shirt video that Plaintiffs have proposed for the first time as a proposed trial exhibit (Plaintiffs' Proposed Trial Exhibit 36).

2. The facts set forth in this declaration are based on my personal knowledge except as otherwise set forth herein. If called and sworn as a witness, I could and would testify competently to the matters set forth herein.

3. I am the Chairman of the Board of Directors of John Varvatos Enterprises, Inc. ("JVE").

4. The Playboy tee shirt video (Plaintiffs' Proposed Trail Exhibit 36) appears to be two separate videos spliced or combined together. JVE did not produce this video (Plaintiffs' Proposed Trial Exhibit 36). My interview is one part of the spliced/combined together video and the woman wearing the Playboy tee shirt is the other. Neither I nor JVE asked whomever produced this video to splice/combine together my interview with the woman wearing the Playboy tee shirt.

5. My video interview spoke to the power of the Playboy brand and icon and how men asked me about the Playboy tee shirt when I wore it to a concert. I was not speaking about

the Playboy tee shirt worn by the woman in the video nor was I speaking about marketing to women.

6. As I stated in my April 24, 2019 declaration, JVE designed the Playboy tee shirt for men and marketed it to men. It is my understanding that, like JVE, Playboy markets to men. Executed on May 15, 2019.



The image shows a handwritten signature in black ink, which appears to be "John Varvatos". Below the signature, the name "John Varvatos" is printed in a smaller, clean font.